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8 Attorneys for Defendant

9 CENLAR FSB

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

12 KIMAKO STRICKLAND,

13 Plaintiff,

14 v.

15 CENLAR F.S.B.; CITIMORTGAGE, INC. and
16 DOES 1-10, inclusive,

17 Defendants.

2:23-cv-00697-DJC-KJN

[Hon. Daniel J. Calabretta]

**STIPULATION EXTENDING TIME
FOR DEFENDANTS TO RESPOND TO
COMPLAINT AND TO CONTINUE
DEADLINE FOR JOINT STATUS
REPORT PURSUANT TO FED. R. CIV.
P. 26(F)**

18 Pursuant to Local Rule 144(a), Plaintiff Kimako Strickland and Defendants CitiMortgage,
19 Inc. and Cenlar FSB (together “Defendants”), by and through their respective counsel of record,
20 hereby stipulate and agree as follows:

21 WHEREAS, on March 14, 2023, Plaintiff filed a complaint against Defendants in the
22 Superior Court of California, San Joaquin County, in the case captioned *Strickland v. Cenlar F.S.B.*,
23 *et al.*, Case No. STK-CV-URP-2023-2469 (the “State Court Action”);

24 WHEREAS, on March 16, 2023, Plaintiff served each Defendant with the Summons and
25 Complaint in the State Court Action;

26 WHEREAS, on April 13, 2023, Defendants filed a Notice of Removal removing the State
27 Court Action to this Court;

WHEREAS, Defendants did not file an answer or otherwise respond to the Complaint before filing their Notice of Removal. Accordingly, Defendants' responses to the Complaint were due on April 20, 2023, which is seven days after the Notice of Removal was filed. See Fed. R. Civ. P. 81(c)(2)(C);

WHEREAS, the Parties previously stipulated that the deadline for Defendants to file their responses to the complaint would be extended by 28 days to May 18, 2023;

WHEREAS, pursuant to the Court's Initial Case Management Order, the Parties are to confer and submit a joint status report that includes a Rule 26(f) discovery plan by June 12, 2023;

WHEREAS, there have been no prior stipulations to continue case management, discovery, and/or hearing dates;

WHEREAS, the Parties have engaged in settlement negotiations, and seek additional time to continue such discussions;

WHEREAS, the Parties seek to limit unnecessary filings in order to preserve judicial resources and those of the Parties.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the Parties, and through their respective attorneys of record, as follows:

1. Defendants shall have up to and including June 19, 2023 to file and serve an answer or motion under Rule 12 to the Complaint;

2. The Parties shall confer as required by Fed. R. Civ. P. 26(f) and shall prepare and submit to the Court a joint status report that includes the Rule 26(f) discovery plan by July 19, 2023;

IT IS SO STIPULATED.

DATED: May 10, 2023

WOLFE & WYMAN LLP

By: /s/ Jessica B. Coffield
JESSICA B. COFFIELD
Attorneys for Defendant
CENLAR FSB

1 DATED: May 10, 2023

MAYER BROWN LLP

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3 By: /s/ Robert C. Double
4 (as authorized on 5/9/23)
5 ROBERT C. DOUBLE III
6 Attorneys for Defendant
7 **CITIMORTGAGE, INC.**

8 DATED: May 10, 2023

CDLG, PC

9 By: /s/ Tony Cara
10 (as authorized on 5/9/23)
11 ANTHONY CARA
12 Attorneys for Plaintiff
13 **KIMAKO STRICKLAND**

14 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

15 DATED: May 10, 2023

16 /s/ Daniel J. Calabretta
17 THE HONORABLE DANIEL J.
18 CALABRETTA
19 UNITED STATES DISTRICT JUDGE
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